

To: Mr Christopher Grace - Case Officer
Development Environment
Development Management
6th Floor
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

**Monks Orchard Residents' Association
(MORA) Planning**

Email: christopher.grace@croydon.gov.uk
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18th September 2019
Emails: planning@mo-ra.co
chairman@mo-ra.co
hello@mo-ra.co

Reference	19/03633/DISC
Application Received	Fri 02 Aug 2019
Application Validated	Fri 02 Aug 2019
Address	9A Orchard Rise Croydon CR0 7QZ
Proposal	Details pursuant to conditions 2 (external materials), 7 (land levels), 9 (Construction logistics plan), 16 (Tree planting and protection), 17 (Rockery protection) of planning permission 18/06070/ful Demolition of the existing house and ancillary office and erection of a two-storey block of 4 flats and 5 three bedroom houses, provision of parking spaces, refuse storage and cycle stores.
Status	Awaiting decision
Case Officer:	Christopher Grace
Deadline determination:	Fri 27 Sep 2019

Dear Mr Grace

Please consider the following issues prior to determination or approval of the listed conditions for Application at Ref: 19/03633/DISC. | Details pursuant to conditions 2 (external materials), 7 (land levels), 9 (Construction logistics plan), 16 (Tree planting and protection), 17 (Rockery protection) of planning permission 18/06070/FUL for: Demolition of the existing house and ancillary office and erection of a two-storey block of 4 flats and 5 three bedroom houses, provision of parking spaces, refuse storage and cycle stores. | 9A Orchard Rise Croydon CR0 7QZ

The Local affected Residents convened a meeting on 10th September to raise the following issues. Attendees and endorsements are given at Appendix A.

The purpose of this document is to:

- assist you in your determination of the efficacy of the relevant conditions of approval of this development;
- ensure that local residents concerns are documented and recorded in the event of future disputes, and to
- prevent, or mitigate as much as possible, any disruption to the project or the way of life of local affected residents during demolition, site clearance, construction and making good.

The Resident's comments are in Blue Text.

The Site Plan Drawing Number 6722 offered with Ref: 19/03633/DISC is Revision A and NOT the approved amended Revision B Dated November 2018 showing the required Turning Head.



Condition 2 – External Materials

Notwithstanding any materials specified in the application details of all external materials to be used on the development including the proposed bricks, roof material, balcony enclosure and window treatment shall be submitted to and approved by the local planning authority in writing before those particular parts of the development commences. The development shall be carried out in accordance with the approved materials.

In order to assess the suitability of the proposed materials, in the interests of the appearance of the locality, in accordance with London Plan (2016) Policies 7.4 and 7.6, DM10 of the Croydon Local Plan (2018).

- Timber framed buildings are a safety hazard; fire ravages exceptionally quickly through them and could rapidly spread to adjacent properties, fences and trees. Quality control is of the utmost priority but difficult to maintain in timber framed buildings. Fires from such buildings under construction have often started when the builders and staff have left the site unattended.

- In the event of this development being of Timber Frame construction, local residents have shown significant concern as a result of recent fires, the latest being at **Worcester Park** where a four-storey block of Timber Framed flats were completely destroyed by fire. Fire Hoses were deployed from high rise ladders above the fire which took hold within 20 minutes.
- The Access drive limitations at 9a Orchard Rise would prevent such quick deployment and high turntable ladders would not be able to be deployed to gain adequate height to fight such a fire there.
- We need to place on record local residents' valid concerns regarding the limitations of access to this site in the event of any emergency.

Condition 7 – Land Levels

Details of the land levels, finished floor levels and datum line at a scale 1:50 including section drawings taken through the site in relation to the 5 residential houses and block of 4 flats shall be submitted to the local planning authority in writing for approval prior to commencement of development

Reason: To protect the visual amenity of existing neighbours in terms building height, visual appearance in accordance with Council policy DM10 of the Corydon Local Plan 2018

The reason for the proposed condition being a pre-commencement condition are as follows: The scheme involves the construction of buildings of a site of variable level before the insertion of footings/pilings, close to neighbouring boundaries and therefore neighbouring visual amenity would need to be safeguarded.

- Datum Points and drain levels have not been identified on the provided drawings to ensure Land Levels are maintained to ensure the overall height of the development is maintained as approval requirements.
- The lowering of the foundations for the flats to meet the approved height will necessitate huge amounts of debris from the demolition of the current bungalow and outbuildings at 9a. Lorries will be unable to gain access and all debris will have to be removed via small dumper trucks.
- If a permanent structure is affected the Party Wall act will apply.
- Building Control are requested to closely monitor the site preparation and datum levels to ensure finished floor levels meet the approved plans and result in the correct approved height of the proposed development.

Condition 9 – Construction Logistics Plan

Notwithstanding anything contained in Schedule 2 to the Town and Country Planning (General Permitted Development) Order 2015 (or any amendment or replacement thereof), prior to the commencement of any building or engineering operations, a Construction Logistics Plan shall be submitted to the Local Planning Authority for approval. The Statement shall include **amongst other things** the following information for all phases of the development, which shall only be implemented as approved: -

- (1) hours of deliveries,
- (2) parking of vehicles associated with deliveries, site personnel, operatives and visitors,
- (3) facilities for the loading and unloading of plant and materials, guard against dust
- (4) details of the precautions to guard against the deposit of mud and substances on the public highway, to include washing facilities by which vehicles will have their wheels, chassis and bodywork effectively cleaned and washed free of mud and similar substances prior to entering the highway.
- (5) Access arrangement to the site during the demolition and construction periods.

Reason: In order to ensure that the development does not prejudice the safety or free flow of pedestrian and vehicular traffic on the highway or cause undue inconvenience to other users, or adversely impact on the amenities of the occupiers of nearby properties as required by Policies DM10, DM30 of the Croydon Replacement Unitary Development Plan (The Croydon Plan) 2006 Saved Policies.

The reason for the proposed condition being a pre-commencement condition is as follows the scheme involves the demolition of buildings, this condition requires that this is managed for environmental and highway safety reasons.

Construction Logistics Plan:

It is understood that the document "Construction Logistics Plan" was prepared and approved by the same individual. This is NOT an appropriate arrangement and NOT in accordance with Quality Assurance and Audit Functions.

It is requested that contact details for the Site Manager (name, phone number and email address) is provided, such that any difficulties can be resolved amicably at the earliest opportunity and to liaise to arrange periodic progress meetings with local resident representative.

Provide a construction programme for residents, giving basic information: e.g. start date, site set up period, site clearance, demolition start, foundations, drainage, external walls, roof construction ... etc.

Developer's Submission Document

Introduction:

Para 1:

- a) Statements which include terminology including "**Wherever possible**", "**where practicable**", "**even as possible**" and "**avoiding peaks**" allows undefined acceptable deviations from a requirement. Each variable event needs a quantifiable definition or a defined tolerance which specifies the requirement within quantifiable parameters. The statements as provided are actually meaningless.

- b) There is no reference to managing pedestrians on and across the PUBLIC footpath.
- c) We would appreciate clarification and notification of actual delivery times.
- d) We request plans of water, sewage and drainage pipes as 9a is shared with 8 Orchard Way. **Party Wall Agreement** would likely be appropriate if shared drainage is proposed.

(1) hours of deliveries,

Delivery Vehicles / Laying up Prevention Steps Delivery hours will be limited to **Monday-Friday 08.00-17.00** with **occasional deliveries** Saturday 08.00-12.00.

Delivery due times will also be **carefully considered** to **avoid** peak traffic times in the vicinity (**07.00-09.00 – 16.00-18.00**). This condition forms part of subcontract documentation and subcontractors are reminded of this at pre-commencement meetings.

- a) **"Carefully considered"** does not preclude deliveries within these peak times (07:00-09:00hrs & 16:00-18:00hrs). It should be stipulated that deliveries **will NOT be allowed** during these peak traffic times.
- b) In the event that this cannot be avoided for specific identified reasons, we require notifications **to be displayed outside the application site** at least **24hrs prior to the delivery** if delivery is to be during these (07:00-09:00hrs & 16:00-18:00hrs) peak periods.
- c) Working hours will comply with London Borough of Croydon environmental requirements (Working Time Directive).
- d) Working on Saturday afternoons, Sundays and Bank/Public holidays is not permitted by LBC Environmental requirements.

(2) parking of vehicles associated with deliveries, site personnel, operatives and visitors,

- a) This condition is very poorly worded as the phrase has no significant meaning.
- b) How many stacked delivery construction vehicles (lorries) waiting for access (parked in Orchard Rise) is allowed at any given time?
- c) Where will this lorry park be?
- d) Site personnel vehicles shall not be parked in the local vicinity, but preferably shall be parked on the site within the site boundaries.
- e) Parking, which they say is NOT allowed on site, will be a major concern to local residents as Orchard Rise will become one big car park.
- f) Where will the "authorised" contractors parking be?
- g) we request nominated locations for on-street parking for construction personnel to ensure concentration of contractors parking do NOT cause local Parking STRESS and congestion for local residents and other road users.
- h) Authorised visitors shall also park any vehicles preferably on site within the site boundaries and NOT on the adjacent public highway; or where designated.

- i) Consideration should be given to the close proximity of two schools – Orchard Way Primary and Orchard Park High School nearby in Orchard Way.
- j) Parking should be avoided adjacent to all dropped kerb entrances.

(3) facilities for the loading and unloading of plant and materials, guard against dust

- a) Facilities do not define the requirements for the loading and unloading of plant or materials. There is a significant issue relating to access to the site and concern of local residents are that delivery vehicles are unlikely to be able to gain access to the site for the unloading and loading of plant and materials due to access width limitations.
- b) Are there Size limits of vehicles or certain vehicles restricted access to the site?
- c) Swept Path Diagrams should be provided to prove evidence that vehicle Access to the site is possible for all construction delivery vehicles (Lorries) types as the width of Orchard Rise and the narrow access drive could severely restrict access to certain types of vehicles.
- d) If vehicles cannot gain access and the unloading of construction materials requires **“Craned”** deployment;
 - i. Where will the Crane be sited?
 - ii. What will be the **radius/arc/swept coverage** of the Jib to ensure vertical lift?
 - iii. What safeguards and insurance protections are provided or required to cover any subsequent damage to local residents personnel, properties or gardens?
 - iv. If **“Craned”** lifting of construction material from roadside Parked delivery vehicles, the lift must be vertical/perpendicular to avoid uncontrolled swinging of the load which could damage properties or gardens or overhead telephone cables.
 - v. What insurances are provided against any damage afforded by construction or delivery vehicles to local residents’ vehicles parked in Orchard Rise or any adjoining street from **“craned”** or other lifting/unloading methods?
 - vi. Tower crane. Any **unauthorised** over sail of the jib over adjoining properties would be a **trespass**.
- e) We need notice of intended service connections in the road
- f) The actual procedures and activities to guard (prevent) Dust and Noise disturbances during the following activities are required to be specified:
 - i. Loading and unloading of plant and materials
 - ii. Demolition of the existing dwelling and the removal of debris
 - iii. The marking out and excavation of foundations footings, drainage and the laying of services (Gas/Electric/Drains & sewage)
 - iv. During the erection of the buildings and laying of forecourts and driveways.



- (4) **details of the precautions to guard against the deposit of mud and substances on the public highway, to include washing facilities by which vehicles will have their wheels, chassis and bodywork effectively cleaned and washed free of mud and similar substances prior to entering the highway.**
- a) What facilities are provided to prevent mud and debris washed off vehicles by high pressure hosing, blocking main drains?
- (5) **Access arrangement(s) to the site during the demolition and construction periods.**
- a) None specified or provided.

Applicants Construction Logistics Plan

Para 4. Pedestrian Route Checklist

- a) It is not clear whether these routes relate to inside rather than outside the site or both. For instance, Q6 refers to crossing main vehicle routes whereas Q3 & Q9 refer to access to work areas and welfare facilities (which are on-site)! There needs to be a banksman or traffic controller for any movements in and out of the site and especially when crossing the public footpath.
- b) Q2 On what basis have they answered "Yes"? Should the answer to Q2 should be No!
- c) Q3 On what basis have they answered "Yes"? Should the answer to Q3 should be No!
- d) Q6 On what basis have they answered "Yes"? The answer to Q6 cannot be answered until they have done a risk assessment and confirmed suitable traffic marshalling/banksmen.

5. Vehicle Routes

- a) Q10 What about permanent structures?
- b) Q11 Where will these parking areas be?

5.1 Actions to be taken

- 5.1.1 Ensure routes are clearly designated and protected

a) Is it intended to block the footpath? Surely the path should be left open and the barriers be at the site entrance to stop traffic coming out of the site and crossing the public footpath until suitably marshalled?

5.1.2 Ensure routes are clearly designated and protected

b) One-way system is obviously out of the question

5.1.6 Provide safe routes at parking areas. Plan site setup to avoid need for pedestrians to cross routes

c) Traffic marshalling/banksmen required?

5.1.11 Ensure sufficient parking areas exist. If necessary, provide banksmen to ensure vehicles are parked safely. Ensure adequate lighting exists.

d) Expecting all personnel to use public transport is completely unrealistic.

6. Vehicle Movements

a) Q1 On what basis have they answered "yes"? How have they been planned?

b) Q7 Seems to relate to routes within the site? See the action 6.7 that refers to site traffic requirements before entering site - what about exiting the site?

c) Q10 The answer to the question should be yes and then action 6.10 will apply

6.1 Actions to be taken

Q1 Ensure routes provide sufficient space to turn. Keep routes to a Minimum. – One Way is not an option

Q7 Drivers will be made aware ... before entering site "And exiting the site"!

12 Site Logistics and Traffic Management Plan

12.1 Site Location

- Should read "... Every care will be taken... "
- "All personnel are encouraged to use public transport" It is totally unrealistic to expect all personnel to use public transport - How are

personnel expected to transport various tools and heavy equipment on public transport?

12.6 Access & Egress from Site

- All vehicles exiting the site should be controlled by a banksman.

12.7 Deliveries & Storage

- a) Who is the Logistics Manager?
- b) Deliveries during mid-afternoon will conflict with the end of the school day, increasing congestion on Orchard Way/Orchard Avenue.
- c) Hours of deliveries must conform with the environmental terms as laid down by Croydon Council. Local Residents will be monitoring and keep diary notes of deliveries to ensure they keep to agreed times.
- d) Where will the holding area be?
- e) If any problems arise, residents will request Police and Council Highway Officers to attend in order to keep highway free to allow continual flow of traffic and avoid congestion.

12.8 Provision Loading & Off-Loading Materials

- a) Vehicles exiting the site should be directed by a Marshall/Banksman as well.

Other Issues not requested in the formal condition 9 statement:

Measures for control of dust and suppression of noise are commented in detail under the related Air Quality (Dust) Risk Assessment.

- a) What measures for control of "dust" and of "noise" are to be provided as required and/or offered? What are the actual procedures that are to be implemented and for how long?
 - b) Required to meet Croydon and National Environmental requirement and any legislation to ensure environmental air quality is maintained to acceptable standards. What monitoring of local air quality will be provided?
- The provision of signs and barriers
 - Adequate parking and off-loading / storage areas

- c) Where? (signs and barriers) – Not marked on Site Layout (wrong Drawing Revision A; NOT Revision B with Turning Head).

The Site Logistics and Traffic Management Plan (see section 12.3) shows the following

- The proposed routes for pedestrian access into and out of the site, to the offices and welfare facilities and to the work areas.
- The proposed routes for all site deliveries into and out of the site indicating loading and storage area.

- d) Neither of the above are clearly marked on Site Layout Drawings (wrong Revision, Rev A; NOT Rev B).

In accordance with local authority strategic policy and recommendations Turnbull will **endeavour** to promote suppliers and contractors to commit to the FORS Silver Standard where practicable.

Working Hours on Site:

08.00-18.00 Monday – Friday
08.00-13.00 Saturday

- e) Local Residents to be informed of any activity required outside these periods.
- f) Suggest Notification be placed outside entrance to development when deliveries are expected 24 hrs in advance.
- g) Obtain name and phone number of site/logistics manager and arrange weekly meetings with residents committee.

Deliveries are booked in with Site Manager and logged on the central register.

- h) This doesn't inform local residents.

Persistent offenders will be reported to the Construction Director, who will action with the directors of the offending company.

- i) We do not want ANY offenders, let alone "persistent" offenders!

Utility Co-ordination – Turnbull will "endeavour" to promote coordinated delivery of utility connections where possible to minimise disruption to traffic network and local residents. Details of statutory authorities / delivery partners will be provided to local authority on request to assist in coordinating this delivery and utilising schemes such as road opening sharing schemes.

- j) This must be maintained – not just "**endeavour**" as you can always say you are endeavouring to meet this requirement whenever you don't meet the requirement.
- k) Is it possible to levy fines against any that do not meet the instruction?

- l) If on-site working is starting in September then they should already know by now who their site manager will be!

Site Manager	TBC
Assistant Site Manager / Delivery Co-Ordinator	TBC

- m) Local Residents need these contact details – Some on-site activity will require attention or resolution immediately!

12.2 Site Set-Up

Turnbull regards the initial site set-up as being fundamental on the Orchard Rise project. It is at this stage when the Site is made secure through hoardings and lighting, Site Welfare and Offices Facilities provided, Noise and Dust Control measure put in place and Traffic Management Signage erected.

- a) There is No indication of hoardings or gated access on the associated site layout Drawing (Wrong Revision!)
- b) The Limits of Construction Vehicles' parking within the local road network not clearly marked on the Site Layout drawings.
- c) Once hoarding is erected – what will be the width of the site access? As clearly the width is already very restricted at 3.1m and the hoarding structure could significantly reduce this access width.
- d) A fence is to be erected alongside Number 9 Orchard Rise prior to ANY work on the site being carried out which is likely to reduce site access width below 3m.
- e) Party Wall Agreement would be appropriate for any works adjacent to Numbers 9 and/or 11 Orchard Rise prior to ANY works being carried out, all costs in respect of the agreement to be funded by the developer or his agent.

- Reception / meeting room area
- Welfare facilities
- Secure Storage Area
- Lay-down Area
- Lifting areas
- Scaffolding zones etc

- f) These are not **Clearly** marked on the Site Layout Drawing.

Access to the site

Access/Egress to the site will be via Orchard Rise. A pedestrian gate will be included in the hoarding for operatives/visitors arriving by foot of Orchard Rise. All visitors including site operatives will be required to sign in and out at main reception prior to gaining entry to the site with an attendance record maintained on the site.

- a) No location of the pedestrian 'Gate' shown on the Site Layout Drawings
- b) Will the access be at the forward end of the access drive into Orchard Rise or at the site entrance further inward of the access drive?
- c) We request the plan where the pedestrian "wicket Gate" access to the site will be provided. Will it impede the pedestrians using the pavement between numbers 9 & 11 Orchard Rise?

All vehicle access will be made via vehicle crossover (existing)

Roads and footpaths in the vicinity of the site will be maintained on a regular basis and on completion of the works they will all be reinstated to the condition they were found in at the start of the works. A delapse survey has been undertaken and will be made available to third parties in relation to this project on request.

- d) Need photos of grass verges before development starts so we have record to make sure that reparations are appropriate at completion of development.

All vehicles leaving the site will have the tyres and under carriage power hosed to ensure no debris or dirt are brought outside of site and sully the surrounding area.

- e) See comment above re: local drainage

Site access will be further monitored by means of **CCTV** installed at earliest available period in construction phase, this will include monitoring of all vehicle access and egress points. Data will be stored for a period of 2 weeks; requests by third parties for this data in connection with the project will be duly considered under English Law.

- f) What does that actually mean? – what are the procedures required of local residents' requests to see or have copies of **CCTV images** or duration of images over a requested time period?
- g) What areas are covered – not detailed on the site layout plans.
- h) Permission is to be obtained for any CCTV cameras that overlooks and captures activities in neighbouring properties and gardens, their fixed location and visual coverage (will they be operating continuously, Infra-red motion detector or time stamped delayed. What will be the back-up period and for how long retained and available for inspection?)

Other Issues

Refuse Storage

- a) Only three bins are shown on the Site Layout plans for the flats which we assume only to be used by residents of the Flats. There are no separate allocations for Refuse and Recycling Bins for the 5 houses! This will necessitate plans for 15 more bins for the 5 houses to be provided!

The plans currently show only 3 bins to be placed directly against the fence of number 9. Are these the large communal rubbish bins? Will other large communal bins be provided for the 5 houses?

- b) This is a serious health and safety problem for the residents of 9 Orchard Rise.
- c) Will a custom-built shed be provided for the Refuse and Recycling storage as required by the **Policy DM13**: Refuse and recycling?
- d) Grass verges to be monitored for damage. Residents will take before and after photos to ensure contractor makes good any damage on completion of the project/contract.
- e) Washing of lorries and mud on road. To be monitored and drainage monitored for blockages

Condition 16 - Tree planting and protection

Details of a Tree Planting Programme and Tree Protection Methodology Plan to be undertaken to include suitable temporary ground protection for tree roots to neighbouring boundary trees including use of hand-dig approach and root protection areas, shall be submitted to the local planning authority before the commencement of development and the approved details shall be implemented in accordance with the approved plan thereafter.

Reason: To ensure that adequate protection measures are provided in accordance with Council policy DM28 and having regard to the policies of the Croydon Local Plan 2018

The Tree Planting & Management Plan date August 2019 uses Site Plan Drawing Number 6722 offered with Ref: 19/03633/DISC at Revision A and Not the approved amended Revision B Dated November 2018 showing the required Turning Head.

Existing Trees (Tree to be retained Not Numbered on Site Layout Drawing):

- Chamaecyparis Lawsonia (Lawsons Cypress)
- Malus sp. (Apple)
- Acer Palmatum (Japanese Maple)
- Corylus Avellana (Hazel) Ligustrum
- Ovalifolium (Privet)
- Sambucus Nigra (Elder)
- Fraxinus Excelsior (Ash)
- Acer Pseudoplatanus (Sycamore)
- Crataegus Monogyna (Hawthorn)
- Taxus Baccata (Yew)

- a) Require a correlation between the "Tree Planting Program" Document and the "Tree Survey Report" to be labelled on the Site Layout Drawing.

- b) Require Full photographs of each Tree to be retained to ensure proper protection has been afforded during construction and that each retained tree has NOT been damaged.

Condition 17 - Rockery protection

Details of measures to protect rockery in northwest corner of the site, including elevation, planting shall be submitted to the local planning authority for approval prior to commencement of the development. The details as approved shall be implemented and shall remain for duration of the development process.

Reason: To ensure that adequate protection measures are provided in accordance with Council policy DM28 and having regard to the policies of the Croydon Local Plan 2018. The reason for the proposed condition being a pre-commencement condition are as follows: The scheme involves works on a site where a protected species has been identified to exist which requires that this area remain undisturbed.

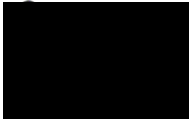
No Comment

These comments have been agreed at a Residents Meeting on 10th September and endorsed as such by all the listed Residents at [Appendix A](#) to this representation letter.

Please inform us at planning@mo-ra.co of your decisions in due course.

Yours sincerely


Derek C. Ritson - I. Eng. M.I.E.T. (MORA Planning).


Sony Nair – Chairman, Monks Orchard Residents' Association.
On behalf of the Executive Committee, MORA members and local residents.

Cc:

Mr. Pete Smith	Head of Development Management (LPA)
Cllr. Sue Bennet	Shirley North Ward Councillor
Cllr. Richard Chatterjee	Shirley North Ward Councillor
Cllr. Gareth Streeter	Shirley North Ward Councillor

Bcc:

MORA	Executive Committee
Local Residents	
Interested Parties	